

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	
GWG Holdings, Inc., et al.,¹	§	Case No. 22-90032
	§	
Debtors.	§	Chapter 11
	§	
	§	(Jointly Administered)

**L BOND MANAGEMENT LLC’S NOTICE OF FILING THE
PROPOSED LITIGATION TRUST AGREEMENT
[Related Docket No. 1678]**

PLEASE TAKE NOTICE that on May 24, 2023, L Bond Management, LLC (“LBM”),² pursuant to Article 1.G. of the *Debtors’ Further Modified Second Amended Joint Chapter 11 Plan, Submitted by the Debtors, the Bondholder Committee, and L Bond Management, LLC as Co-Proponents* [Docket No. 1678] (the “Plan”), filed, with the express permission, consent, and authorization of the mediator, the Honorable Bankruptcy David R. Jones (the “Mediator”), the mediator-proposed Litigation Trust Agreement, attached hereto as **Exhibit 1**.

PLEASE TAKE FURTHER NOTICE that the attached Litigation Trust Agreement represents a version of the Litigation Trust Agreement that LBM would adopt and support on a final basis.

PLEASE TAKE FURTHER NOTICE that the Mediator proposed Litigation Trust Agreement, as drafted by the Mediator, did not address Exhibit A to the Litigation Trust Agreement, the Litigation Trustee’s compensation. Changes to Exhibit A to the attached Litigation Trust Agreement represent LBM’s proposal and not the proposal of the Mediator.

[Remainder of Page Intentionally Left Blank]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); and GWG Life USA, LLC (5538). The location of Debtor GWG Holdings, Inc.’s principal place of business and the Debtors’ service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors’ proposed claims and noticing agent: <https://donlinrecano.com/gwg>.

² Any capitalized term not defined herein shall have their meaning ascribed in the Plan.

Respectfully submitted on the 24th day of May, 2023.

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**ATTORNEYS FOR L BOND MANAGEMENT
LLC**

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2022, a true and correct copy of the foregoing Limited Objection and Response was served via the Court's CM/ECF system to all parties consenting to service through the same.

By: /s/ Matthew S. Okin

Matthew S. Okin